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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KING ISAAC UMOREN,

Defendant.

Case No.: 2:16-CR-00374-APG-NJK

**STIPULATION TO CONTINUE
SENTENCING HEARING**

IT IS HEREBY STIPULATED AND AGREED by and between JASON B. FRIERSON, United States Attorney, through PATRICK BURNS, Assistant United States Attorney, and SARAH A. KIEWLICZ, Trial Attorney, Department of Justice – Tax Division, and Defendant KING ISAAC UMOREN, through his counsel, CHRIS RASMUSSEN, ESQ., and JESS MARCHESE, ESQ., that the sentencing in this matter be continued from its currently scheduled date and time of November 2, 2022 at 9:30 a.m. to a date and time convenient to the

1 Court and preferably for the week of December 5, 2022.

2 This Stipulation is entered into for the following reasons:

3 1. The sentencing hearing in defendant's two cases, Case No.'s 2:16-CR-00374-APG-
4 NJK and 2:19-CR-00064-APG-NJK is currently scheduled for November 2, 2022 at 9:30 a.m.

5 2. Defendant requires additional time to consult with his attorneys regarding
6 objections to the presentence investigation report and to otherwise prepare for sentencing.

7 3. Counsel for the government handling the civil forfeiture in these cases requires
8 additional time to address outstanding forfeiture issues that appear to require litigation and
9 decision by the Court.

10 4. The parties request that the sentencing be rescheduled for the week of December
11 5, 2022, if that scheduling would be convenient to the Court. They further request that
12 defendant's deadline for the filing of any objections to the presentence investigation report be
13 continued to October 31, 2022.

14 5. This is the first request to continue this joint sentencing in both of defendant's cases
15 and is made in good faith and not for purposes of delay.

16 DATED this 11th day of October, 2022.

17 Respectfully submitted,

18 JASON B. FRIERSON
19 United States Attorney

20 //s//Patrick Burns

21 PATRICK BURNS
22 Assistant United States Attorney
23 SARAH A. KIEWLICZ
24 Trial Attorney – Tax Division
United States Department of Justice

//s//Chris Rasmussen

//s// Jess Marchese

CHRIS RASMUSSEN, ESQ.
JESS MARCHESE, ESQ.
Counsel for Defendant King Isaac Umoren

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KING ISAAC UMOREN,

Defendant.

Case No.: 2:16-CR-00374-APG-NJK

ORDER ON THE PARTIES'
STIPULATION TO CONTINUE
SENTENCING

ORDER

GOOD CAUSE APPEARING, it is hereby ordered that:

The sentencing hearing in defendant's Case No.'s 2:16-CR-00374-APG-NJK and 2:19-CR-00064-APG-NJK, currently scheduled for November 2, 2022 at 9:30 a.m., is vacated and reset to November 30, 2022 at 1:30 p.m. in Courtroom 6C.

IT IS FURTHER ORDERED THAT,

Defendant shall have until October 31, 2022 to file any objections to the presentence investigation report.

Dated this 12th day of October, 2022

By: 

JUDGE ANDREW P. GORDON
UNITED STATES DISTRICT COURT JUDGE